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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 3, 1997

Hand Delivery

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: In the Matter of Administration of the North American
Numbering Plan, CC Docket No. 92-237

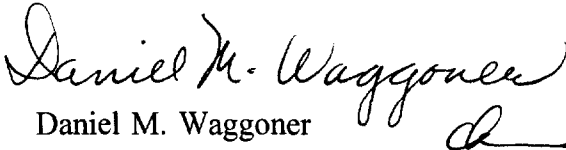
Dear Sir:

Enclosed for filing on behalf of NEXTLINK Communications, Inc. are Reply Comments in response to the Commission's Public Notice in the above-captioned matter. An original and nine copies are included for distribution to the Commissioners.

In addition, we are submitting today two additional copies with cover letter to Jeannie Grimes, Common Carrier Bureau, and one copy to International Transcription Services, Inc.

Please date stamp and return to the messenger the copy of this cover letter.

Sincerely,


Daniel M. Waggoner

Counsel for NEXTLINK
Communications, L.L.C.

DMW/tm

Enclosures

No. of Copies rec'd 0+10
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William F. Caton

July 3, 1997

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cc: Jeannie Grimes
Common Carrier Bureau
Federal Communications Commission
2000 M Street, N.W., Suite 235
Washington, D.C. 20554
(cover letter and two hard copies)

International Transcription Services, Inc.
1231 20th Street, N.W.
Washington, D.C. 20036
(one hard copy)

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

In the Matter of:)	Docket No. 92-237
)	
ADMINISTRATION OF THE)	
NORTH AMERICAN NUMBERING PLAN)	
_____)	

**REPLY COMMENTS OF
NEXTLINK COMMUNICATIONS, INC.**

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Attorneys for NEXTLINK
Communications, Inc.

July 3, 1997

NEXTLINK Communications, Inc. ("NEXTLINK") is a competitive local exchange carrier deploying facilities in various markets around the country to compete with incumbent carriers. The selection of a qualified, neutral and efficient North American Numbering Plan Administrator ("NANPA") is critical to the development of local telecommunications competition and consistent with section 251(e)(1) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("Act"). NEXTLINK supports the recommendation of a majority of the North American Numbering Council ("NANC") that Lockheed Martin Corporation ("Lockheed") replace Bellcore as the NANPA, and urges the Commission to act expeditiously and appoint Lockheed as the NANPA.

A. Lockheed Is A Qualified, Neutral and Efficient Choice For NANPA

NEXTLINK concurs in NANC's recommendation of Lockheed as the NANPA. Lockheed has substantial experience with local number portability ("LNP") administration, an issue of critical importance to new entrants in local exchange markets such as NEXTLINK. Lockheed also has considerable numbering experience from its administration of the 800/888 Help Desk. Lockheed's proposed use of advanced computer systems with automated on-line access systems for application processing offers an efficient, competitively neutral administrative process. Moreover, while both Lockheed and the first alternate, Mitretek Systems

("Mitretek"), are technically competent, Lockheed's proposed cost--half that of Mitretek--represents a \$22.5 million dollar savings to the telecommunications industry and ultimately to consumers.

Lockheed's proposal to centralize Central Office ("CO") Code administration, a function currently handled by 13 local exchange carriers, including all the regional Bell Operating Companies ("RBOCs"), would allow the consistent application of the CO Code assignment guidelines necessary in the competitive local exchange market. In addition, the NANC has recommended that Lockheed serve as the Number Portability Administration Center ("NPAC") in four of the seven United States regions. The rapid rate of number exhaust, and the accompanying relief plans such as area code splits and number overlays, have a direct impact on NEXTLINK. By serving as both the NANPA and NPAC, Lockheed will be able to develop new approaches and technologies using number portability to improve number conservation and thus limit attempts by incumbent carriers to use numbering problems for competitive advantage.¹

¹ For this reason, the Commission denied the Pennsylvania Public Utility Commission's petition for expedited waiver to permit 7-digit dialing within area codes affected by an overlay. Pennsylvania Public Utility Commission Petition For Expedited Waiver, CC Docket No. 96-98, Order (April 4, 1997). That petition was supported by Bell Atlantic. In paragraph 26 of that Order, the Commission recognized that a waiver of the 10-digit dialing requirement of the Local Competition Second Report and Order would "create hardship for new entrants" and "would undermine the pro-competitive objectives underlying the . . .

B. The Commission Should Implement Lockheed's Selection As The NANPA Without Delay

As the Commission recognized in initiating this proceeding, and as Congress required in the Act, the development of telecommunications competition requires the immediate selection of a neutral and effective NANPA. Numbering resources are essential to market entry and effective competition, and each day's delay in the selection of the NANPA preserves for yet another day the bottleneck to competition employed by the RBOCs and incumbent LECs. Speed to market is essential for the survival and success of new entrants in the local exchange business. Until the Commission acts in this proceeding, RBOCs will continue to use their role as number administrators in the anticompetitive manner recognized in section 271(c)(2)(B)(ix) of the Act (requiring the RBOCs to provide nondiscriminatory access to telephone numbers).

The Commission must also move to eliminate uncertainty in the selection of Lockheed as the NANPA. Rejected applicants, incumbents seeking anticompetitive delay, or NANC members in the minority will seek to modify the NANC recommendation in an avowed effort to "perfect" it. However, no such modification is necessary. As a well qualified neutral NANPA, selected by a

10-digit dialing requirement." See Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Second Report and Order and Memorandum Opinion and Order, FCC 96-333, 61 Fed. Reg. 47284, 47328 (1996).

consensus of industry, consumers and state regulators, Lockheed will efficiently and effectively develop the future of number administration as charged by the Commission in the NANP Order. NANC's recommendation of Lockheed is appropriate and supported by the record. Any delay under the rubric of "perfection" will only cause competitive harm without providing any concomitant benefit.

C. Conclusion

The growth of telecommunications competition requires a neutral NANPA and the efficient implementation of the Commission's number administration model as set forth in the NANP Order. Lockheed is technically qualified to be the NANPA, and was recommended by a broad consensus of interests, through a Federal Advisory Committee, in a thorough, public process. The Commission should implement the NANC recommendation as quickly as possible, and with as little uncertainty as possible.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP
Attorneys for NEXTLINK
Communications, Inc.

By *Daniel M. Waggoner*
Daniel M. Waggoner *ch*

Dated: July 3, 1997